

The Honorable Michael Powell
Chairman, The Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket 03-133

Dear Chairman Powell:

The Small Business Survival Committee (SBSC) is a national, nonprofit small business advocacy organization. SBSC supports public policies that create a productive economic environment for small businesses and entrepreneurship.

On behalf of the SBSC, I am writing to urge the FCC to oppose efforts by the Regional Bell Operating Companies (RBOCs) and other parties to impose huge in-state access fees on many calling-card calls (DOCKET 03-133). If the FCC allows these new access charges, it would clearly lead to higher calling card prices for everyone and that, in turn, would harm small businesses.

For example, although large retailers such as Target, cater to the mass market, there remain numerous small businesses catering to important segments not served by the big retailers. Adding in-state access fees to calls that clearly route out-of-state will drive up prices and reduce demand, both of which will harm these businesses' already thin margins.

Further, it will hasten a trend that research firm IDC sees in which smaller providers will increasingly face consolidation and bankruptcy. These smaller providers should be provided the opportunity to continue to explore innovative solutions to respond to such trends and changes in the market - yet, action by the FCC to allow exorbitant access fees leaves these providers with little flexibility to respond, if not survive.

Higher calling card prices would also harm small businesspeople who rely on them while traveling.

Such a scenario is economically harmful and needless. That is why SBSC urges the FCC to ensure that neither the RBOCs nor any other local provider or regulator be allowed to impose in-state access fees on calling card calls involving out-of-state enhanced services.

Sincerely,

Karen Kerrigan
Chairman, SBSC